
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Cathy L. Waldor
	:	
v.	:	Mag. No. 21-9455
	:	
LARONMIR MCFADDEN,	:	
KENDELL MCFADDEN,	:	<u>CRIMINAL COMPLAINT</u>
SAVON HARRISON, and	:	
DONTAVIAN JONES,	:	

I, Special Agent Christopher O'Brien, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

by telephone

Special Agent Christopher O'Brien
Bureau of Alcohol, Tobacco, Firearms and Explosives

Special Agent O'Brien attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on September 27, 2021 in New Jersey.

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE

s/Cathy L. Waldor 9/27/21

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Unlawfully Sell Firearms)

From at least in or around July 2021 through in or around September 2021, in the Counties of Somerset and Passaic, in the District of New Jersey and elsewhere, the defendants,

**KENDELL MCFADDEN,
LARONMIR MCFADDEN,
SAVON HARRISON, and
DONTAVIAN JONES,**

did knowingly and intentionally conspire and agree with each other and others to commit an offense against the United States, namely, not being a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms, to transfer, sell, trade, give, transport, and deliver any firearm, to any person other than a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms, and knowing and having reasonable cause to believe that said persons did not reside in the States in which the transferor resided, contrary to Title 18, United States Code, Sections 922(a)(5) and 924(a)(1)(D).

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, Christopher O'Brien, am a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"). I am fully familiar with the facts set forth here based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related here, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background

1. On or about July 13, 2021, members of the Paterson Police Department recovered an S&W Shield EZ 9-millimeter handgun bearing serial number REX1099 (the "Recovered Firearm") during the course of an arrest.

2. Law enforcement later learned that the Recovered Firearm was purchased along with four (4) additional firearms, listed below, a mere five days earlier by Savon Harrison ("Harrison") on or about July 9, 2021 from two federal firearms licensees in or around Florence, South Carolina ("Seller-1" and "Seller-2").

- One (1) Springfield Armory XD-9 9-millimeter handgun, bearing serial number BA393141;
- One (1) S&W SD9 9-millimeter handgun bearing serial number FDK3416;
- One Taurus G2C 9-millimeter handgun bearing serial number 1C059247; and
- One (1) Century Canik TP9 9-millimeter handgun bearing serial number 21CB30951.

(collectively the "Suspect Firearms")

3. Based on the temporal proximity between the purchase in South Carolina and its recovery in New Jersey (*i.e.*, five days) and the Recovered Firearm being part of a multiple firearm sale, law enforcement had probable cause to believe that Harrison trafficked the Suspect Firearms from South Carolina to New Jersey.

4. Law enforcement learned that, on or about September 24, 2021, Harrison purchased a Stoeger STR-9C pistol, bearing serial number T6429-21S08771 from Seller-1 (the "Stoeger Firearm").

5. Law enforcement also learned that after purchasing the Stoeger Firearm, Harrison departed Seller-1 in a white 2020 Mercedes Benz GLC 300, bearing North Carolina License Plate RBR9997 (the "Vehicle").

6. On or about September 26, 2021, law enforcement observed the Vehicle driving in New Jersey. After positioning themselves behind the Vehicle, law enforcement observed the Vehicle drift into the shoulder of the highway, in violation of New Jersey motor vehicle laws.

7. As officers approached the Vehicle, they observed approximately four people moving around inside the Vehicle.

8. After making contact with the occupants of the Vehicle, law enforcement identified the driver as Dontavian Jones ("Jones"). Law enforcement thereafter identified Kendell McFadden ("Kendell McFadden") in the passenger seat, Harrison in the rear passenger seat and Laronmir McFadden ("Laronmir McFadden") to be seated in the rear driver's seat.

9. During the course of the motor vehicle stop, law enforcement observed Harrison moving around and reaching into the seat pocket behind the passenger seat.

10. Based on the foregoing facts and for officer safety, law enforcement removed all the occupants from the Vehicle. Law enforcement observed in plain view next to Jones as he exited the Vehicle, an empty Blackhawk gun holster in the driver's side door. Law enforcement also observed that a cellular phone next to both Jones and Kendell McFadden had a GPS map directing Jones to an address in Paterson, New Jersey.

11. After being removed from the Vehicle, Harrison advised law enforcement that he was in possession of a firearm. Law enforcement thereafter recovered a Glock 19, 9 millimeter pistol, bearing serial number AFUR549 and a magazine loaded with ten (10) rounds of ammunition from the passenger seatback pocket in front of Harrison.

12. During a lawful search of the Vehicle, law enforcement recovered the following additional firearms and ammunition from the center console in the rear passenger seat between Harrison and Laronmir McFadden:

- One (1) Glock 44, 22 caliber pistol, bearing serial number AFFW652, loaded with ten (10) rounds of ammunition; and
- One (1) Glock 48, 9 millimeter pistol, bearing serial number BTYL165, loaded with ten (10) rounds of ammunition.

13. During a lawful search of the trunk of the Vehicle, law enforcement located a blue backpack and grey duffle bag containing the below firearms and ammunition:

- Blue Backpack
 - One (1) Glock 19, 9 millimeter pistol, bearing serial number BNVU574;
 - One (1) Taurus PT111 G2, 9 millimeter pistol, bearing serial number TKU85870;
 - One (1) Sig Sauer P320, 9 millimeter pistol, bearing serial number 58J166560;
- Grey Duffle Bag
 - One (1) Highpoint Model JCP 40 caliber pistol, bearing serial number SN-X7194439;
 - One (1) Glock 17, 9 millimeter pistol, bearing serial number BABE361;
 - The Stoeger Firearm, purchased by Harrison on or about September 24, 2021; and
 - Approximately 20 rounds of ammunition.

14. On or about September 15, 2015, Kendell McFadden was convicted of unlawful possession of a firearm, in violation of N.J.S.A. 2C:35-5B.

15. A check of Jones' criminal history revealed that Jones is prohibited from possessing, purchasing, shipping, and transporting firearms because of a prior conviction which could have been subject to an excess of one year of imprisonment under South Carolina law.

16. A check of Laronmir McFadden's criminal history revealed that Laronmir McFadden is prohibited from possessing, purchasing, shipping, and transporting firearms because of a prior conviction which could have been subject to an excess of one years of imprisonment under South Carolina law.

17. Neither Kendell McFadden, Harrison, Laronmir McFadden, or Jones are licensed under the provisions of Chapter 44 of Title 18 of the United States Code as an importer, manufacturer, dealer, or collector of firearms.